



September 11, 2015

**Via ECF**

Honorable Lorna G. Schofield  
U.S. District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*  
Case No. 1:13-cv-07789-LGS (S.D.N.Y.)

Dear Judge Schofield:

We write in response to the Court's September 3, 2015 Order (ECF No. 453) concerning the continuing need for redactions in the Second Consolidated Amended Class Action Complaint ("SAC"). The parties to the consolidated action have conferred with each other and the United States Department of Justice. Plaintiffs are authorized to file this letter on behalf of all Defendants and the DOJ.

As set forth in the attached chart (Exhibit 1), the DOJ has requested that certain allegations in paragraphs 129, 136, 137, 145-48, 150-70, 199, 211-12, 215-17, 224-229, 234, 236-38, 250-51, and 385-88 of the SAC remain redacted. The DOJ's reason for requesting these redactions is to the extent that the DOJ interviews relevant individuals as part of its ongoing investigation into various practices within the foreign exchange markets, it would prefer to limit access by such individuals to documents that they did not write, receive, or have access to at the time. Accordingly, the DOJ requests continuing redactions related to the text of chats, but takes no position on removing the redactions for timestamps or the identity of the trader bank.

The parties to the consolidated action do not object to the DOJ's request to continue the redactions identified in Exhibit 1.

Where the DOJ states that it takes no position as to a redaction, for example, paragraph 128, the parties have agreed that those redactions are no longer necessary and will be removed.

Very truly yours,

HAUSFELD LLP

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*Interim Co-Lead Class Counsel*

# **EXHIBIT 1**

**EXHIBIT 1**

(Redaction Chart for Second Amended Consolidated Class Action Complaint)

<b>Paragraph</b>	<b>DOJ Position</b>
¶128	No position.
¶129	Redact both lines of chat text.
¶132	No position.
¶133	No position.
¶134	No position.
¶136	No position on first currently redacted sentence. Redact remainder of paragraph.
¶137	Redact sentence.
Footnote 58	No position.
¶145	No position on first currently redacted sentence. Redact remainder of paragraph.
¶146	No position on first currently redacted sentence. Redact remainder of paragraph.
Footnote 60	No position.
¶147	No position on first currently redacted sentence. Redact remainder of paragraph.
¶148	No position on first currently redacted sentence. Redact remainder of paragraph.
¶149	No position.
¶150	No position on first two currently redacted sentences. Redact remainder of paragraph.
Footnote 61	Redact.
¶151	No position on first currently redacted sentence. Redact remainder of paragraph.
¶152	No position on first currently redacted sentence. Redact remainder of paragraph.
¶153	No position on first currently redacted sentence. Redact remainder of paragraph.
Footnote 62	Redact.
¶154	No position on first currently redacted sentence. Redact remainder of paragraph.
¶155	No position on first two currently redacted sentences. Redact remainder of paragraph.
¶156	No position on first three currently redacted sentences. Redact remainder of paragraph.
¶157	No position on first two currently redacted sentences. Redact remainder of paragraph.
¶158	No position on first two currently redacted sentences. Redact remainder of paragraph.
¶159	No position on first two and fourth currently redacted sentences. Redact third sentence and remainder of paragraph.
¶160	No position on first currently redacted sentence. Redact remainder of paragraph.

**EXHIBIT 1**

(Redaction Chart for Second Amended Consolidated Class Action Complaint)

<b>Paragraph</b>	<b>DOJ Position</b>
¶161	No position on first currently redacted sentence. Redact remainder of paragraph.
¶162	No position on first two currently redacted sentences. Redact remainder of paragraph.
¶163	No position on first currently redacted sentence. Redact remainder of paragraph.
¶164	No position on first currently redacted sentence. Redact remainder of paragraph.
¶165	No position on first currently redacted sentence. Redact remainder of paragraph.
¶169	No position on first currently redacted sentence. Redact remainder of paragraph.
¶170	No position on first two currently redacted sentences. Redact remainder of paragraph.
¶198	No position.
¶199	Redact line of chat.
¶210	No position.
¶211	Redact paragraph.
¶212	No position on first currently redacted sentence. Redact remainder of paragraph.
¶215	No position on first currently redacted sentence. Redact remainder of paragraph.
¶216	No position on first currently redacted sentence. Redact remainder of paragraph.
¶217	Redact second sentence and remainder of paragraph.
¶224	No position on first currently redacted sentence. Redact remainder of paragraph.
¶225	No position on first currently redacted sentence. Redact remainder of paragraph.
¶226	Redact second and third sentences and remainder of paragraph.
¶227	No position on first currently redacted sentence. Redact remainder of paragraph.
¶228	No position on first currently redacted sentence. Redact remainder of paragraph.
¶229	No position on first currently redacted sentence. Redact remainder of paragraph.
¶234	No position on first currently redacted sentence. Redact remainder of paragraph.
¶236	No position on first currently redacted sentence. Redact remainder of paragraph.
¶237	Redact paragraph.
¶238	Redact paragraph.
¶250	No position on first currently redacted sentence. Redact remainder of

**EXHIBIT 1**

(Redaction Chart for Second Amended Consolidated Class Action Complaint)

<b>Paragraph</b>	<b>DOJ Position</b>
	paragraph.
¶251	No position on first two currently redacted sentences. Redact remainder of paragraph.
¶284	No position.
¶385	Redact chat text.
¶386	No position on date redaction. Redact chat text.
¶387	Redact chat text.
¶388	Redact chat text.
Appendix 1, page 1	No position.
Appendix 1, page 3	No position.
Appendix 1, page 4	No position.
Appendix 1, page 6	No position.
Appendix 1, page 7	No position.
Appendix 1, page 8	No position.
Appendix 1, page 9	No position.